

ALVERSON TAYLOR MORTENSEN & SANDERS  
JONATHAN B. OWENS, ESQ.

Nevada Bar No. 7118  
7401 West Charleston Blvd  
Las Vegas, NV 89117  
Telephone: 702-384-7000  
Facsimile: 702-385-7000  
jowens@Alversontaylor.com

SEDGWICK, DETERT, MORAN & ARNOLD LLP  
WAYNE B. MASON, ESQ., *pro hac vice to be submitted*  
([wayne.mason@sdma.com](mailto:wayne.mason@sdma.com))

DAWN SHAWGER MCCORD, ESQ., *pro hac vice to be submitted*  
([dawn.mccord@sdma.com](mailto:dawn.mccord@sdma.com))  
1717 Main Street, Suite 5400  
Dallas, TX 75201  
Telephone: (469) 227-8200  
Facsimile: (469) 227-8004  
*Attorneys for Defendant*

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WELTONIA HARRIS, individually and on )  
behalf of all others similarly situated, )

Plaintiff, )

v. )

U.S. PHYSICAL THERAPY, INC., )

Defendant. )

CIVIL ACTION NO.  
2:10cv1508-JCM-LRL

**JOINT STIPULATION TO  
EXTEND STAY OF DISCOVERY**

Plaintiff Weltonia Harris, individually and on behalf of all others similarly situated ("Plaintiff"), and Defendant U.S. Physical Therapy, Inc. ("USPT") file this Joint Stipulation to Stay Discovery and respectfully state as follows:

1. Plaintiff filed her Original Class Action Complaint on September 3, 2010, alleging that USPT violated provisions of the Fair Credit Reporting Act ("FCRA").

2. Defendant USPT filed its Original Answer on October 4, 2010 and its Amended Answer on October 22, 2010.

3. On October 20 and October 22, 2010, the parties conducted a conference according to Federal Rule of Civil Procedure 26(f) and LR 26-1.

1           4.           On November 5, 2010, the parties filed, and the Court entered, a Joint  
2 Stipulation to Stay Discovery while the parties engaged in an informal inquiry regarding the  
3 nature and scope of the class, including the identity of the proper defendants to this suit, the  
4 venue of this action, and the number of members of the putative class.

5           5.           The parties have made significant progress in these endeavors and believe they  
6 are getting closer to reaching a resolution of this matter.

7           6.           As such, the parties request that discovery and scheduling deadlines, including  
8 discovery regarding class certification and the merits of the claims, be stayed for an additional 45  
9 days from the date of filing this stipulation while the parties continue to work together to reach  
10 an early resolution.

11           WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that this  
12 Court grant the Joint Stipulation to Extend Stay of Discovery and stay discovery in this matter  
13 for an additional 45 days.

14  
15 DATED: January 5, 2011

Respectfully submitted,

16 MITCHELL D, GLINER, ATTORNEY AT LAW

17 /s/ Mitchell D. Gliner

18 MITCHELL D. GLINER, ESQ.  
19 3017 West Charleston Blvd., Suite 95  
Las Vegas, Nevada 89102

20 Michael A. Caddell, *pro hac vice*  
21 Cynthia B. Chapman, *pro hac vice*  
22 Craig C. Marchiando, *pro hac vice*  
CADDELL & CHAPMAN  
131 Lamar, Ste. 1070  
Houston, TX 77010-3027

23  
24 Leonard A. Bennett, *pro hac vice*  
25 Matthew J. Erasquin, *pro hac vice*  
CONSUMER LITIGATION ASSOCIATES  
12515 Warwick Blvd. Ste. 100  
Newport News, VA 23606

26  
27 Attorney for Plaintiffs  
28

ALVERSON TAYLOR MORTENSEN & SANDERS

/s/ Jonathan B. Owens  
JONATHAN B. OWENS

Wayne B. Mason, *pro hac vice to be submitted*  
Dawn Shawger McCord, *pro hac vice to be submitted*

SEDGWICK, DETERT, MORAN & ARNOLD LLP  
1717 Main Street. Suite 5400  
Dallas, TX 75201

Attorneys for Defendant, U.S. Physical Therapy, Inc.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE  
DATED: 1-10-11